

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN
COMMUNITY SUPPORT, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, et al.,

Defendants.

Case No. 1:25-cv-38

DECLARATION OF Wafa JUNAID

I, Wafa Junaid, declare as follows:

I submit this declaration in support of Plaintiffs' Motion for Preliminary Injunction. I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would testify competently and truthfully as follows:

1. I am over eighteen years of age and am competent to make this Declaration.
2. I am an attorney with the American Civil Liberties Union Immigrants' Rights Project.
I am one of the attorneys representing Plaintiffs in the instant case.
3. Attached hereto as exhibits are true and correct copies of the following.

Exhibit Document

1. *Social Security Numbers for Children*, SOC. SEC'Y ADMIN. (2024).
2. Stephen Carlson & Joseph Llobera, *SNAP Is Linked with Improved Health Outcomes and Lower Health Care Costs*, CTR. ON BUDGET & POL'Y PRIORITIES (Dec. 14, 2022).

3. Valeria LaCarte et al., *SNAP Access and Participation in U.S.-Born and Immigrant Households*, MIGRATION POL'Y INST. (2023).
4. Kristen M. Hurley et al., *Early Child Development and Nutrition: A Review of the Benefits and Challenges of Implementing Integrated Interventions*, 7 ADVANCES NUTRITION 357 (2016).
5. Julia Paradise & Rachel Garfield, *What Is Medicaid's Impact on Access to Care, Health Outcomes, and Quality of Care?*, KFF (Aug. 2, 2013).
6. Janet Currie & Anna Chorniy, *Medicaid and Child Health Insurance Program Improve Child Health and Reduce Poverty But Face Threats*, 21 ACAD. PEDIATRICS S146 (2021).
7. Jennifer Van Hook & Michael Fix, *The Demographic Impacts of Repealing Birthright Citizenship*, MIGRATION POL'Y INST. (2010).
8. Ciro Avitabile et al., *Citizenship, Fertility and Parental Investment*, CTR. FOR STUD. ECON. & FIN. (2012).
9. Christina Gathmann & Julio Garbers, *Citizenship and Integration*, LAB. ECON. (June 2023).
10. Christina Felfe et al., *Why Birthright Citizenship Matters for Immigrant Children: Short- and Long-Run Impacts on Educational Integration*, 38 J. LAB. ECON. 143 (2020).
11. Christina Felfe et al. *More Opportunity, More Cooperation? The Behavioral Effects of Birthright Citizenship on Immigrant Youth*, J. PUB. ECON. (Aug. 2021).
12. Kevin Appleby, *Ten Years After a Fateful Court Decision, the Dominican Republic Still Has a Statelessness Problem*, CTR. FOR MIGRATION STUD. (Oct. 23, 2023).
13. *Invisible Kids: Childhood Statelessness in the UK*, EUR. NETWORK ON STATELESSNESS (July 2021).
14. Sara Catherine Barnhart, Note, *Second Class Delivery: The Elimination of Birthright Citizenship as a Repeal of "the Pursuit of Happiness"*, 42 GA. L. REV. 525 (2008).
15. Amanda Warner, *Plyler v. Doe: Implementation, Challenges and Implications for the Future*, INST. FOR IMMIGR. RSCH. (2022).
16. Bruce Lesley, *In Harm's Way: The Consequences of Denying Birthright Citizenship for America's Children and Our Future*, FIRST FOCUS ON CHILDREN. (2023).
17. Margaret D. Stock, *Is Birthright Citizenship Good for America?*, 32 CATO J. 139 (2012).

18. Jennifer Hansler, *Venezuelan Embassy Run By Opposition in US Closes After Guaido Ouster*, CNN (Jan. 6, 2023).

19. *Passport Issuance for Children of Indonesian Citizens Born in the United States After August 1, 2006*, CONSULAR OFFICE OF THE REPUBLIC OF INDONESIA IN THE UNITED STATES OF AMERICA (2015).

I hereby declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on January 21, 2025, in New York, New York.



Wafa Junaid